

Exhibit 2

UNITED STATES DISTRICT COURT.
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

In Re: Valsartan, Losartan and
Irbesartan Products Liability
Litigation,
Case No. 1:19-md-2875-RBK

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HIGHLY CONFIDENTIAL REMOTE VIDEOTAPED DEPOSITION
OF PAULETTE SILBERMAN
MONDAY, MARCH 22, 2021
9:05 a.m.

Witness' Location:
30 Ascension Street
Passaic, New Jersey

TRANSCRIPT of the stenographic notes of the
proceedings in the above-entitled matter as taken by
and before DAVID LEVY, a Certified Court Reporter and
Notary Public of the State of New Jersey, held
remotely over the Internet, on Monday, March 22,
2021, commencing approximately 9:05 in the forenoon,
pursuant to Notice.

1 Dr. Baum 's professional judgement prescribing
2 Valsartan?

3 A. Yes.

4 Q. According to page 3 of your plaintiff
5 fact sheet, you filled your Valsartan prescription at
6 CVS from 2008 to 2018?

7 A. Well, it was QuickChek but CVS bought
8 out QuickChek recently, but it was always QuickChek.
9 Now it's at CVS, 'cause they bought it out.

10 Q. So you filled your Valsartan
11 prescription at QuickChek, which turned to CVS from
12 2008 to 2018, correct?

13 A. Well, it turned to CVS around 2019.

14 Q. Okay. So previously it was QuickChek?

15 A. Yes.

16 Q. Prior to filling your prescription for
17 Valsartan at the pharmacy, did you know which
18 manufacturers made the Valsartan carried by that
19 particular pharmacy?

20 A. Yes. It was Solco.

21 Q. How did you come to know that?

22 A. Because when it was recalled, they told
23 me -- well, was more than one. It was Solco and
24 another company, I think a Chinese company. They
25 told me that it was from there.

1 Q. Did you ever get a prescription for
2 Valsartan with the CVS label?

3 A. No.

4 Q. Okay. And those are all my questions
5 about that.

6 Looking at Google Maps, it looks like
7 the address for QuickChek is in a strip mall next to
8 an Advance Auto Parts, is that right?

9 A. Right.

10 Q. Okay. Is the store still open or has
11 QuickChek the store officially closed as well?

12 A. No, the store is open. Just the
13 pharmacy closed.

14 Q. Okay. What communication, if any, did
15 you get from QuickChek about the pharmacy closing?

16 A. I have no idea. I was wondering myself
17 why they closed, but I never questioned it. I
18 figured a lot of places are closing, and they just
19 combined with CVS.

20 Q. Okay. Did CVS send you any documents
21 about that?

22 A. No.

23 Q. You have knowledge that your pharmacy
24 records from QuickChek are now available at CVS,
25 correct?

1 A. Right, but I don't need CVS.

2 Q. Do you have any other information about
3 the relationship between QuickChek and CVS?

4 A. No.

5 Q. Okay. Have you ever spoken with a
6 pharmacist at the CVS store?

7 A. Not about this, no.

8 Q. And you've never received any Valsartan
9 from a CVS store, correct?

10 A. Correct.

11 Q. And you were asked a lot of questions
12 about talking to your pharmacist, and you at times
13 said, "And they told me," or, "And they said." That
14 would have been a pharmacist at QuickChek or some
15 other place besides CVS, correct?

16 A. Just QuickChek.

17 Q. Just QuickChek. Okay. And then you
18 mentioned that you now go to a different pharmacy in
19 the neighborhood?

20 A. Yes.

21 Q. Is that right?

22 A. Yes.

23 Q. What was the name of that store?

24 A. DAS.

25 Q. And I think you said that the pharmacist